

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Re:

Order Instituting Rulemaking into the Review of
the California High Cost Fund B Program

Rulemaking 06-06-028

(Filed June 29, 2006)

**REPLY COMMENTS OF OMNIPOINT COMMUNICATIONS, INC., dba T-MOBILE (U-
3056-C) ON THE ASSIGNED COMMISSIONER'S RULING REGARDING THE
SCOPING AND SCHEDULING OF PHASE II ISSUES**

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Date: November 28, 2007

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Pursuant to the Assigned Commissioner’s Ruling Regarding the Scoping and Scheduling of Phase II Issues, and the Assigned ALJ’s October 19, 2007 extension of time to file comments, Omnipoint Communications, Inc., dba T-Mobile (“T-Mobile”), respectfully submits the following reply comments.

I. OVERVIEW

The comments filed by the various parties on November 9th reinforce the complexity of trying to provide subsidies to support what the Commission has determined to be competitive voice communications in the State. At its core, the perpetuation of these subsidies is antithetical to a competitive market since, among other things, it can distort a consumer’s ability to evaluate the true economic costs of her options and otherwise diverts consumer resources to a particular carrier regardless of whether the consumer chooses to obtain services from that carrier. Thus, not

surprisingly, the comments generally reveal a divergent set of views on how to maintain (or whether to maintain) a subsidy that no longer seems justifiable in the current market.¹

Nonetheless, T-Mobile recognizes that the Commission is intent on maintaining the Fund at least in some form. Thus, in order to further assist with the process of developing a Fund that promotes the shared goal of universal service while mitigating the potential negative impact of carrier subsidies, T-Mobile offers the following reply comments on a few particular issues raised by some of the other parties.

II. REPLY COMMENTS

A. Subsidies Should be Based on a Per Line/Per Household Basis

The major ILECs propose that subsidy bids (and awards) should be based on the total amount of support requested to serve a particular area, and not – as is currently the case - on a per line/per household basis.² Such a proposal should be rejected for several reasons including the following:

First and perhaps foremost, this proposal fails to recognize the new paradigm for voice communications set forth in the URF I decision.³ In particular, the proposal fails to take into

¹ That is not to say that there is no public policy rationale to support telecommunications subsidies. To the contrary, T-Mobile supports the concept of providing assistance to low-income consumers and allowing them to choose the service that best meets their individualized needs. Indeed, such a program perhaps best promotes the shared goal of universal service at reasonable rates. See e.g., Comments of Omnipoint Communications, Inc., dba T-Mobile (U-3056-C) on the Assigned Commissioner's Ruling on the Scoping and Scheduling of Phase II Issues (November 9, 2007) at pp. 7-8 (the "T-Mobile Opening Comments"); see also Sprint Opening Comments at p. 15 (limit subsidy to consumers based on means test).

² See Phase II Comments of AT&T at pp. 4, 10; see Verizon California Opening Comments at p. 8. AT&T also seems to use these comments to suggest that service quality standards imposed on ILECs should be imposed on all carriers that participate in the Fund. See AT&T Opening Comments at pp. 5-6. Those suggestions, however, are more appropriately addressed in R.01-12-004.

³ See generally, Order Instituting Rulemaking on the Commission's Own Motion to Assess and Revise the Regulation of Telecommunications Utilities in Rulemaking 05-04-005, Opinion, D. 06-08-030 (August 24, 2006) ("URF I").

account that the Commission has determined that there is competition in the voice communications market and thus – unlike in a monopoly situation – the prevailing bidder is not expected to serve all of the potential consumers in a given market. In fact, subsidies based on the total amount of support “required” to serve a particular area can only lead to inflated demands for subsidies that amount to an “insurance policy” for carriers otherwise accustomed to operating as monopolies. Although such a system may arguably have been defensible 10 years ago, that is no longer the case in light of the current competitive environment.⁴

Second, the central question for the Commission should be which carrier is prepared to offer services in high cost areas most efficiently and at the lowest cost to the individual consumer; not which carrier is able to obtain a potential windfall depending on the number of consumers it ultimately serves.

Third, as discussed below, the proposal to submit bids based on the total support “required” would unfairly preclude other qualified carriers in a given area from receiving subsidies and thus undermine the ability of consumers to select the service provider that best meets their needs.⁵

B. In a Competitive Market, There is no Justification for Selecting Only One COLR

Several parties suggest that there should be only one COLR per geographic area⁶ and, as a result, subsidies would be provided to only that one carrier. Reverse auctions, however, are not necessarily designed to select a particular carrier, but can also be utilized to establish a particular

⁴ See Comments of Omnipoint Communications, Inc., dba T-Mobile (U-3056-C) on the Proposed Decision of Commissioner Chong Re Interim Opinion Adopting Reforms to the High Cost Fund-B Mechanism (August 24, 2007) at pp. 3-6 (the “T-Mobile August 24, 2007 Comments”).

⁵ T-Mobile recognizes that there is a legitimate debate about whether subsidies should be available on a per line or a per household basis. Without necessarily addressing the question at this time, it notes that a certain percentage of consumers are utilizing competitive voice services that do not necessarily correlate directly with a particular “household”.

⁶ See Phase II Comments of AT&T at p. 13; see Opening Comments of Division of RatePayer

subsidy amount. Thus, provided a carrier is willing to assume the obligations of providing basic voice communications to all consumers in a given area,⁷ it is difficult to imagine a justification for providing the subsidy only to the carrier that sets the subsidy amount by virtue of its bid. In fact, such a program would only serve to limit consumer choice in the face of competition and otherwise further distort that market. As long as all recipients of subsidies are obligated to provide service, there is no obvious reason to limit the subsidy only to the “winning bidder”.⁸

C. The Focus of the Fund Should be on Voice Communications

Certain parties seem to propose that basic service be expanded to include services other than voice communications or that subsidized lines be used to provide ancillary services.⁹ Although it is not entirely clear what these parties intend, it is imperative that the service to be provided be focused on basic voice communications. As an initial matter, the Fund is designed to promote voice communications. Moreover, one of the key drivers in the reexamination of the Fund is apparently the Commission’s determination that there is competition in the voice communications market. To expand the nature of the Fund to support other services would thus potentially undercut the basic principle underlying these revisions.

T-Mobile does not mean to suggest that carriers should necessarily be precluded from providing other services to consumers on non-subsidized lines. However, it is imperative that all

Advocates at p. 12; Verizon California Opening Comments at p. 16.

⁷ A few parties have suggested that carriers be allowed to combine CBGs for bidding purposes. See e.g., AT&T Opening Comments at pp. 11, 14; Verizon Opening Comments at pp. 6, 16; TURN Opening Comments at pp. 33-35. Although so-called “combinatorial” bids may offer advantages in certain situations, it is important that the Commission make sure they are not improperly used to preclude bids from low-cost providers who serve only some of the CBGs (or whatever geographic area the Commission ultimately selects for bidding purposes) that have been combined.

⁸ Indeed, the Fund was supposed to be designed to encourage new entrants by making the subsidy available to those carriers as well. See D.95-07-050 at p. 34. To now limit the subsidy to a single carrier would be ironic. See also, Cox Opening Comments at pp. 5-6 (any eligible bidder should be able to draw the subsidy amount, not just the bidder that sets the subsidy).

⁹ See e.g., TURN Opening Comments at p. 23; see also Verizon Opening Comments at p. 14.

interested, eligible carriers provide bids on functionally equivalent services which otherwise are deemed to constitute basic voice communications.¹⁰

D. The Fund Must be Competitively Neutral

Practically all of the parties recognize that the Fund, to the extent it exists beyond January 1, 2009, must be reformulated so that it is competitively neutral.¹¹ For example, the current definition of basic service precludes certain carriers, including wireless providers, from being eligible to participate in the Fund (e.g., the current requirement to provide Lifeline).

Nonetheless, at least one party seems to suggest that the current definition of basic service set forth in D.96-10-066 should be maintained.¹² To the extent that suggestion implies that the current definitions should not be modified to broaden eligibility to non-ILECs, such a suggestion should be disregarded.¹³

As noted in earlier comments, the concept of competitive neutrality is well-recognized by the Commission, especially in this context. For example, in setting up the Fund, the Commission was specifically charged with developing a “competitively neutral and broadbased program ... [for] telephone corporations serving areas where the cost of providing services exceeds rates charged by providers ...”¹⁴ This in turn reflects the Legislature’s declared goal of removing

¹⁰ See also Sprint Opening Comments at pp. 15 and 21 (no subsidy for lines with additional services).

¹¹ See e.g., Phase II Comments of AT&T et al. at p.2; Opening Comments of CCTA at pg. 4; Verizon California Opening Comments at pp. 25-26; Time-Warner Opening Comments at p. 8; and T-Mobile Opening Comments at pp. 5-7.

¹² See SureWest Opening Comments at pg. 3 (suggesting that the definition of basic service should be maintained but asserting it has no comment at this time on broadening the base for Fund eligibility).

¹³ Citizens comes closest to acknowledging the underlying concern with allocating subsidies based on the most efficient technology available. See Citizens Opening Comments at p. 3 (“Since cellular costs to over an area are typically lower than landline costs, a cellular carrier may be able to provide its service at a lower cost.”) Although a well-designed auction process would help determine if that is indeed the case, Citizens categorically opposes a reverse auction. *Id.* at pp. 2-4.

¹⁴ Public Utilities Code § 739.3.

“barriers to open and competitive markets” and encouraging “the development and deployment of new technologies and the equitable provision of services in a way which efficiently meets consumer need and encourages the ubiquitous availability of a wide choice of state-of-the art services.”¹⁵

Simply put, to continue to force all consumers to subsidize LEC operations because by definition they are the only carriers eligible to participate in the Fund is detrimental to consumers and inconsistent with both state and federal telecommunications policies.

E. Use of the HM 5.3 to Update Cost Proxy Models is Ill-Advised

With the exception of the ILECs, every other party has expressed grave concerns with the use of the HM 5.3 to update cost proxies for purposes of the Fund.¹⁶ Although these parties have expressed their concerns in various ways, they each seem to recognize the resource intense nature of such a cost proceeding and the limited utility of the potential results either in terms of identifying high cost areas or setting subsidies. In addition, certain parties assert that the HM 5.3 is essentially irrelevant as the ILECs are no longer deploying “copper-based, voice-centric networks, but instead are deploying converged *all-media* networks, where voice imposes a trivial claim on the capacity of the network.”¹⁷ Moreover, reverse auctions obviate the need for cost studies to determine subsidy amounts and the existing CPMs (with perhaps some modification) seem to provide a reasonable surrogate for determining high cost areas.¹⁸

¹⁵ California Public Utilities Code §§ 709(c) and (g).

¹⁶ See e.g., CCTA Opening Comments at pg. 2; Cox Opening Comments at p. 2 (“Any attempt to update the HM 5.3 model forward-looking technologies will be expensive, time-consuming and likely fall short of the more efficient method of a reverse auction.”); Sprint Opening Comments at p.2; T-Mobile Opening Comments at pp. 9-11 and T-Mobile August 24, 2007 Comments at pp. 10-11; Time Warner Opening Comments at pp. 1-2; DRA Comments at p. 4 and TURN Comments at p. 3.

¹⁷ See e.g., CCTA Opening Comments at pg. 2 (emphasis in original); see also Time Warner Opening Comments at pp. 1-2.

¹⁸ See T-Mobile Opening Comments at pp. 10-11; see also Sprint Opening Comments at p.20 (use existing CPMs and reduce costs by 10% - 20%); TURN Opening Comments at p. 3 (unadjusted CPM is

In brief, the suggestion by the major ILECs to use the HM 5.3 to identify high cost areas (and to possibly set subsidy levels)¹⁹ should be rejected as unwarranted and wasteful.

F. Transitional Rate Caps for ILECs Should Not Be Used to Justify Subsidies

Although the ILECs have apparently devoted considerable resources to establish that there is competition in their service areas, at least some of the ILECs seem to explicitly support the concept of transitional rate caps to prevent consumer “rate shock”.²⁰ While T-Mobile supports the idea of providing assistance to low-income consumers so that they can better afford basic voice communications, it believes that the threat of “rate shock” for consumer in general, and the concept of transitional rate caps for ILECs, warrant closer examination.

As an initial matter, it seems likely that the ILECs have adequate incentives (e.g., the ability to provide additional services like DSL, video, etc...) to adjust their rates, if at all, in such a manner that they maintain as much of their customer base as possible. The ILECs have little to gain by being price insensitive or otherwise adjusting their consumer rates in an irresponsible manner. Indeed, if they acted otherwise, consumers would be free – by definition in a competitive market - to select an alternative service provider.²¹

In addition, the Commission determined (at the strong urging of the ILECs) that there was competition in the voice communications market and that the major and mid-sized ILECs no

preferable to HM 5.3 updates).

¹⁹ See AT&T Opening Comments at pp. 11 and 14; Verizon Opening Comments at p. 20. T-Mobile further notes that the AT&T suggestion to use the 2000 census and the HM 5.3 to determine high cost areas is almost certainly guaranteed to be an exhausting process. See also, AT&T Opening Comments at p. 14 (suggesting that new high cost areas will likely be identified in the course of a revised cost study).

²⁰ See SureWest Opening Comments at p. 3 (supports transitional rate caps to avoid rate shock); see also Citizen’s Opening Comments at pp. 4-5 (concern over rate shock, maximum \$4 per year increase in rates). These comments are particularly striking since any possible “rate shock” would be the direct result of the ILEC’s own actions. Cf. AT&T Opening Comments at pp. 22-23 (two year transition to adjust rates to those of other ILECs); Verizon Opening Comments at p. 23 (rate caps are inconsistent with URF I; no more than 3 year transition to full pricing flexibility).

²¹ See e.g., Sprint Opening Comments at p. 27 (competition should moderate rate increases).

longer had the “market power needed to sustain prices above the levels that a competitive market would produce.”²² Indeed, the Commission explicitly highlighted the showing made by Verizon California which “shows the ubiquitous competitive presence of wireless carriers, CLEC wireline carriers and cable service providers present within its service territory.”²³ If the market is truly competitive, and the Fund is competitively neutral (or eliminated), then full pricing flexibility seems appropriate.²⁴

Finally, regardless of whether the Commission determines that it is advisable to impose some sort of interim rate caps on ILECs operating in these high cost areas (or elsewhere) while the Fund is in transition, those rate caps should not be used to justify the perpetuation of subsidies to the ILECs.²⁵

III. CONCLUSION

As noted previously, T-Mobile applauds the Commission’s decision to reduce the CHCF-B Fund and to initiate further proceedings to determine how the Fund can be further reformed to make it competitively neutral and remove artificially created and significant barriers to robust

²² URF I at pp. 117.

²³ Id. at p. 121; see also id. at p. 123 (“While AT&T does not follow Verizon’s lead in showing the ubiquitous presence of competitors throughout its service territory, AT&T nonetheless has convincingly demonstrated that competitive forces limit market power. In particular, AT&T’s central argument – that the unbundling makes the provision of telecommunications services by competitors possible in every wire center throughout its service territory – is compelling.”).

²⁴ TURN, however, asserts that there is no evidence of competition in the high cost areas. See TURN Opening Comments at pp. 9 and 18. Although T-Mobile is not currently addressing the foundation for the Commission’s finding in URF I, or TURN’s assertions noted above, a preliminary review indicates that it provides wireless coverage in at least some of the CBGs that have historically been considered high cost. See e.g., Comments of Omnipoint Communications, Inc., dba T-Mobile (U-3056-C) on Assigned Commissioner’s and Administrative Law Judge’s Ruling Soliciting Further Comments Dated February 23, 2007 at Ex. A (April 27, 2007). To the extent that the Commission were to determine that there is no competition in a given area, however, appropriate safeguards should be considered to make adequate voice telecommunications services available to consumers.

²⁵ For example, as noted in previous comments, there is no justification for such subsidies given that ILECs now have pricing flexibility on the very services that constituted the implicit subsidy the Fund was initially designed to replace. See T-Mobile August 24, 2007 Comments at pp. 3-4.

competition in the voice communications market. Although T-Mobile urges the Commission to consider the eventual elimination of the Fund, it suggests that to the extent the Fund continues to have a place in the telecommunications market, it should be: (a) modified to ensure it functions on a competitively neutral basis, (b) refocused on the needs of low-income consumers and (c) reformed to recognize the competitive and operational advantages of setting subsidies through the use of reverse auctions. T-Mobile further urges the Commission to reject any proposals that would undermine these basic principles as set forth above.

Respectfully submitted this 28th day of November, 2007 at San Francisco, California.

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By /s/

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CERTIFICATE OF SERVICE

I, Richard M. Marshall, certify that the following is true and correct:

I am employed in the City of Oakland, County of Alameda, California, am over the age of eighteen years, and am not a party to the within entitled cause. My business address is 1901 Harrison Street, Suite 1620, Oakland, CA 94612.

On November 28, 2007, I served a copy of:

REPLY COMMENTS OF OMNIPOINT COMMUNICATIONS, INC., dba T-MOBILE (U-3056-C) ON THE ASSIGNED COMMISSIONER'S RULING REGARDING THE SCOPING AND SCHEDULING OF PHASE II ISSUES

attached hereto, on all parties to the attached service list for R.06-06-028 by sending electronic copies by U.S. mail or via email.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on November 28, 2007 at Oakland, California.

/s/
Richard M. Marshall

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[Top of Page](#)

[Back to INDEX OF SERVICE LISTS](#)

